

Attachment B: List of Acceptable/Unacceptable Reporting-Year Revision Methods

Reporting-Year Revisions Found in Annual Reports

Method	Initial Recommendation	Initial staff comments/criteria	Juris. Qty
1 Substituted franchise hauler data for landfill data on that hauler.	Acceptable * (if criteria are met)	Can only replace disposal reporting system tonnage related to that particular hauler(s). Cannot exclude other haulers or self-haul. Should only be applicable if the disposal facility(ies) do not gather daily disposal origin information. Cannot assume the non-franchise portion is a given percentage or amount. Cannot exclude disposal at any permitted landfill or transformation facility. Concerns: hauler guaranteed diversion rates, restrictions on waste origin by landfills, restrictions on disposal site by jurisdictions.	33
2 Contacted non-franchise haulers to verify information.	Acceptable * (if criteria are met)	Cannot subtract tonnage if a hauler is unable to confirm origin information. Cannot assume the non-franchise portion is a given percentage or amount. Explain the method used to verify the new origin information. Concern was expressed that, if some haulers are not aware of the accurate origin of the waste at the time of disposal, the new information provided months later might be even less accurate. Other concerns were expressed regarding whether the existence of a franchise or the need to have a local business license may affect the accuracy of the information provided.	23
3 Presented a generation-based analysis.	Acceptable * (if criteria are met)	Diversion quantities must be documented. Use disposal tons from the Disposal Reporting System. Use documented diversion quantities for the reporting year. May use just the diversion from operated and funded programs (appendix B-2 of the Annual Report). Concern was expressed regarding the accuracy of the diversion data. Is double counting being avoided (by not counting the same material at the generator, recycler, processor, etc.)? How accurately is the jurisdiction of origin information being tracked?	14
4 Sampling period is not representative ("survey anomalies").	Unacceptable as reporting-year revision, however, may be evaluated as additional information for Board consideration.	Many of these issues raised reflect the nature of sampling and extrapolation.	10
5 Unusual Events	Unacceptable as reporting-year revision, however, may be evaluated as additional information for Board consideration.	The Board does not have the authority to give a blanket exclusion to unusual events.	7

* Regardless of method used, jurisdictions must:
 Explain how the data was derived/gathered.
 Be prepared to verify with auditable documentation.